EASTERN DIVISION

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

SABRINA FLOWERS,)
Plaintiff,)
vs.) Court No.: 08 C 449
SOUTH WESTERN MOTOR SALES, INC., d/b/a TOYOTA SCION ON WESTERN AND SANTANDER CONSUMER USA, INC. d/b/a DRIVE FINANCIAL SERVICES))))
Defendants.)

NOTICE OF MOTION

TO: Mr. Keith J. Keogh, Ltd. Law Offices of Keith J. Keogh, Ltd. 227 West Monroe Street, Suite 2000 Chicago, IL 60606

On Tuesday, March 11, 2008, at 10:30 a.m., or as soon thereafter as counsel may be heard, we shall appear before the Honorable Judge George M. Marovich, or any judge sitting in his stead, in Courtroom 1944-C of the United States District Court, Northern District of Illinois, located at 219 South Dearborn Street, Chicago, Illinois, and then and there present, on behalf of Defendant, SOUTH WESTERN MOTOR SALES, INC. d/b/a TOYOTA ON WESTERN and d/b/a SCION ON WESTERN, improperly sued as SOUTH WESTERN MOTOR SALES, INC. d/b/a TOYOTA SCION ON WESTERN's Motion to Dismiss Count I of Plaintiff's Complaint, Motion to Dismiss Count II of Plaintiff's Complaint, Motion to Dismiss Count IV of Plaintiff's Complaint, and Motion to Dismiss Count IV of Plaintiff's Complaint, a copy of which is attached hereto and hereby served upon you.

Respectfully Submitted,

____/s/ Brian P. Shaughnessy
One of the Attorneys for
South Western Motor Sales, Inc.

Brian P. Shaughnessy
Jaya F. Venkataramani
CREMER, KOPON, SHAUGHNESSY & SPINA, LLC
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CERTIFICATE OF SERVICE

The undersigned, being first duly sworn on oath, deposes and says that she served the foregoing Notice of Motion and the document(s) referenced therein by mailing copies, via U.S. Mail, postage pre-paid, to each person identified above on the 28th day of February 2008, at Chicago, Illinois.

Jaura Podela

SUBSCRIBED and SWORX TO before me this 28th day of February, 2008.

Notary Public

186519

MIRIAM GONZALEZ

Notary Pallic, Son of Illinois

ty Commission Express 10/02/2014